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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JASON E. BENSON : CIVIL ACTION

V. : NO. 1:CV-00-1229

WILLIAM G. ELLIEN, M.D., et al. : (Judge Caldwell)
(Magistrate Judge Blewitt)

FILED
SCRANTON

EXHIBIT "A" OF WILLIAM G. ELLIEN, M.D. IN OPPOSITION TO
PLAINTIFF'S MOTION TO PRECLUDE EXPERT TESTIMONY,
COMPELLING DISCOVERY AND FOR SANCTIONS

DEC 26 2001

PER

DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JASON E. BENSON, : CIVIL ACTION
 : NO. 1:CV-00-1229
Plaintiff, :
 : (Judge Caldwell)
vs. : (Magistrate Judge Blewitt)
 :
WILLIAM G. ELLIEN, M.D., et al., :
 :
Defendants :

DEFENDANT'S, WILLIAM G. ELLIEN, M.D.
SUPPLEMENTAL RESPONSE TO PLAINTIFF'S DISCOVERY REQUESTS

Defendant, William G. Ellien, M.D., by and through his attorneys, Gold, Butkovitz & Robins, P.C., hereby provides supplemental responses to Plaintiff's, Jason E. Benson ("Benson") discovery requests, and states as follows:

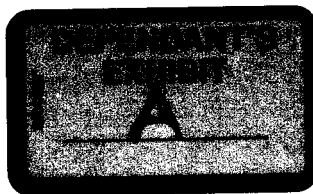
SUPPLEMENTAL RESPONSES TO INTERROGATORIES

Interrogatory No. 1:

Answering defendant has been licensed to practice medicine in the Commonwealth of Pennsylvania since 1987.

Interrogatory No. 2:

Answering defendant received training in the field of pharmacology while in medical school. At this time, through the passage of time, answering defendant does not recall the specifics as to that training. In addition, answering defendant, through the years since medical school, has read and reviewed a variety of medical literature which pertains to the field



of pharmacology, including books, articles in journals, and in the form of manufacturer's packaging inserts and as contained in the PDR (physician's desk reference). Answering defendant has maintained no listing of any of these materials which he has read or reviewed over the years, and cannot therefore respond with any more specificity.


**SUPPLEMENTAL RESPONSES TO
REQUESTS FOR ADMISSIONS**

Request for Admission No. 1:

It is admitted that Benson was epileptic as of July 27, 1999, and until the last date that answering defendant treated Benson. Answering defendant cannot respond with regard to Benson's medical condition beyond that date.

GOLD, BUTKOVITZ & ROBINS, P.C.

BY:


ALAN S. GOLD

SEAN ROBINS

Attorneys for defendants,
William G. Ellien, M.D.

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DATE: November 21, 2001